

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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September 28, 2023

**By ECF**

The Honorable Laura Taylor Swain  
United States Chief District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**Re: United States v. Arturo Balbuena  
19 Cr. 491 (LTS)**

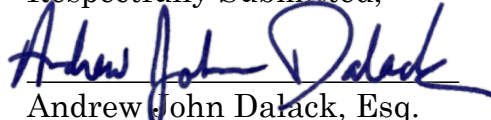
Dear Judge Swain:

I write to respectfully request an adjustment of the filing deadlines for the parties' respective sentencing submissions in the above-captioned case. The government consents to this application.

Sentencing is currently scheduled for October 12, 2023, at 2:00 p.m. The parties understand that the PSR will be filed on or before October 5, 2023. In order to afford the parties the benefit of having the PSR as they prepare their respective submissions, the defense requests leave to file its submission by October 6, with the government's submission to be due October 10. Given Mr. Balbuena's stipulated guidelines range of 4 to 10 months' imprisonment and the time he has already served in jail, the parties respectfully submit that an adjustment of the filing deadlines is more appropriate than an adjournment of the sentencing proceeding.

I thank the Court for its consideration of this application.

Respectfully Submitted,



Andrew John Dalack, Esq.  
Assistant Federal Defender  
Tel: (646) 315-1527

cc: AUSA Rushmi Bhaskaran

The foregoing request is granted. This resolves  
docket entry no. 15. SO ORDERED.

/s/ Laura Taylor Swain, Chief U.S.D.J.  
Dated: 09/29/2023